

EXHIBIT G

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3

4 IN RE: SOCIAL MEDIA)
5 ADOLESCENT ADDICTION/)
6 PERSONAL INJURY PRODUCTS) MDL No. 3047
7 LIABILITY LITIGATION)
8)
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
11 COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE
12

13 COORDINATION PROCEEDING)
14 SPECIAL TITLE [RULE 3.400])
15 SOCIAL MEDIA CASES) Lead Case No.
16 -----) 22STCV21355
17 This Document Relates To)
18)

19 STATE OF TENNESSEE, ex rel.)
20 JONATHAN SKRMETTI,)
21 ATTORNEY GENERAL and)
22 REPORTER,)
23 v.)
24 META PLATFORMS, INC., and)
25 INSTAGRAM, LLC.)
-----)

19 CONFIDENTIAL - ATTORNEYS' EYES ONLY

20 PURSUANT TO PROTECTIVE ORDER

21 VOLUME 3

22 VIDEO-RECORDED

23 DEPOSITION OF ARTURO BEJAR

24 (Pages 752 - 1207)

25 Held at Baker Botts

1001 Page Mill Road, Palo Alto, California

Wednesday, April 9, 2025, 8:37 a.m.

24 REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 were at Meta you did not know Ms. Haugen?

2 A. Correct.

3 Q. Did you also testify yesterday that you
4 had never communicated with Ms. Haugen about this
5 litigation?

6 A. I don't recall what I said yesterday about
7 that.

8 Q. And if you have said that, that would not
9 be accurate, right?

10 MR. CARTMELL: Object to the form.

11 THE WITNESS: That would not be accurate I
12 think.

13 BY MS. JONES:

14 Q. And that's because you have communicated
15 with Ms. Haugen specifically about the lawsuits that
16 were filed -- one of the lawsuits that was filed
17 against Meta by the New Mexico Attorney General,
18 right?

19 A. I don't recall.

20 Q. Well, let's look at the document if you
21 don't remember.

22 Let me hand you what we've marked as
23 Deposition Exhibit Number 77.

24 (Whereupon, Meta-Bejar Exhibit 77 was
25 marked for identification.)

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1 you came back to the company in 2019 that you had
2 certain confidentiality obligations?

3 A. Yes.

4 Q. And in connection with your testimony
5 before Congress, did you provide documents from the
6 company's files to the congressional committee?

7 MR. CARTMELL: Scope.

8 THE WITNESS: I provided documents that I
9 had been acquainted with during my time at the
10 company.

11 BY MS. JONES:

12 Q. And how did you come to have those
13 documents two years after your consulting
14 arrangement had ended in 2023?

15 MR. CARTMELL: Hold on.

16 I'm going to object to the scope of all of
17 this. It's outside of our questioning.

18 MS. JONES: First of all, it's connected
19 with an exhibit that you marked. Second of all,
20 your objection is noted.

21 Q. How was it that you came to have documents
22 from within the company two years after your
23 consulting arrangement had ended in 2021?

24 MR. CARTMELL: Same objection.

25 THE WITNESS: I asked friends if they had

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1 kept documents from their time during the company or
2 if -- what they were in the machines that they had.

3 BY MS. JONES:

4 Q. I'm not sure I understand what that means.

5 Who are the friends you're talking about?

6 MR. CARTMELL: Same objection. Outside
7 the scope.

8 THE WITNESS: I don't recall.

9 BY MS. JONES:

10 Q. And what did you ask your friends exactly?

11 MR. CARTMELL: Same objection. Outside
12 the scope.

13 THE WITNESS: If they had a copy of the
14 e-mail I had sent to Mark.

15 BY MS. JONES:

16 Q. And the documents that you provided to
17 Congress were not just a copy of the e-mail that you
18 had sent to Mr. Zuckerberg, right?

19 MR. CARTMELL: Same objection. Outside
20 the scope.

21 THE WITNESS: That is correct.

22 BY MS. JONES:

23 Q. You had given to Congress hundreds of
24 pages of documents that you had access to by virtue
25 of your time at the company as a consultant, right?

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1 STATE OF CALIFORNIA)
2 COUNTY OF YOLO)

3 I, ELAINA BULDA-JONES, a Certified Shorthand
4 Reporter of the State of California, duly authorized
5 to administer oaths pursuant to Section 2025 of the
6 California Code of Civil Procedure, do hereby
7 certify that

8 ARTURO BEJAR,
9 the witness in the foregoing deposition, was by me
10 duly sworn to testify the truth, the whole truth and
11 nothing but the truth in the within-entitled cause;
12 that said testimony of said witness was reported by
13 me, a disinterested person, and was thereafter
14 transcribed under my direction into typewriting and
15 is a true and correct transcription of said
16 proceedings.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, nor in any
20 way interested in the outcome of the cause named in
21 said deposition dated the _____ day of
22 _____, 2025.

23 
24

25 ELAINA BULDA-JONES, CSR 11720